


UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF VIRGINIA  
LYNCHBURG DIVISION

CLERK'S OFFICE U.S. DIST. COURT  
AT ROANOKE, VA  
FILED

JAN 15 2008

JOHN F. CORCORAN, CLERK  
BY:  DEPUTY CLERK

UNITED STATES OF AMERICA



CRIMINAL COMPLAINT



vs.

Criminal Number [ 7:08 m014 ]

STEVE A. BLACK

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief.

Between on or about 12/15/06 and 1/11/08, in the Western District of Virginia,  STEVE A. BLACK, , and others, known and unknown, did knowingly, with intent to defraud, devise a scheme to obtain money or property, in which a communication was sent via wire, radio, or television communication in interstate commerce for the purpose of executing such scheme in violation of Title 18, United States Code, Section 1343 and 1349.

Furthermore, , STEVE A. BLACK, , and others, known unknown did knowingly transfer, possess, or use, without lawful authority, a means of identification of another person in violation of Title 18, United States Code, Section 1028A.

I further state that I am a Special Agent, United States Secret Service, and that this complaint is based on the following facts:


See attached affidavit.

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

  
SA B. Douglas McIntosh

Sworn to and subscribed in my presence on January 13<sup>th</sup>, 2008, at Lynchburg, Virginia.

Michael F. Urbanski  
United States Magistrate Judge

  
Signature of Judicial Officer

7:08 M014

A F F I D A V I T

I, B. Douglas McIntosh, being duly sworn, depose and state as follows:

1. I have been employed as a Special Agent with the United States Secret Service for approximately five and a half years. I am currently a Special Agent assigned to the Roanoke Resident Agency in Roanoke, VA, where I have been assigned since August 2007. My investigative duties focus primarily on conducting criminal investigations involving credit card fraud, identity theft, bank fraud, as well as counterfeit currency and other obligations. I have participated in the execution of numerous arrest and search warrants.

2. This Affidavit is made in support of an application for an arrest warrant for violation of Title 18, United States Code, Section 1343 where the defendants did knowingly, with intent to defraud, devise a scheme to defraud, or for obtaining money or property by means of false or fraudulent pretenses, representations, or promises, transmits or causes to be transmitted by means of wire, radio, or television communication in interstate or foreign commerce, any writings, signs, signals, pictures, or sounds for the purpose of executing such scheme; Section 1349 where the defendants did conspire with others to commit a violation of Section 1343; Section 1028A during and in relation to a violation of Section 1343, where the defendants knowingly transfers, possesses, or uses, without lawful authority, a means of identification of another person.

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3. On 10/24/07, this affiant met with members of the Central Virginia Computer Crimes Task Force (hereafter CVCCTF) in regards to an ongoing credit card fraud investigation. It was advised that they were investigating a case in which gasoline purchases were being made using counterfeit credit cards by three suspects, later identified as [REDACTED] Steve Black, and [REDACTED]. In the course of this scheme, [REDACTED], Steve Black, and [REDACTED] would meet individuals at the Touch of Class car wash in Lynchburg, VA, or other prearranged locations. They would then accompany these individuals to local gas stations and utilize fraudulent/counterfeit credit cards to purchase gas. They would then fill the individual's car with gas and charge them approximately half price (ie. \$50 worth of gas for \$25).

4. The following transactions took place in the furtherance of this scheme:

4a. On 08/07/07, [REDACTED] purchased \$23.19 worth of gas from a Sheetz store located at [REDACTED], Madison Heights, VA. This purchase was made utilizing the "pay at the pump" method. The credit card used was Capital One Mastercard account number [REDACTED] [REDACTED]. In order for this transaction to occur, a communication was sent from the local Sheetz store to the Sheetz Distribution Center in Claysburg, PA. At the time of this transaction the account was assigned to Victim 1. Steve Black, [REDACTED], and [REDACTED] were not authorized to use this account by Victim 1 and Victim 1 did not authorize this purchase. This transaction was captured on Sheetz surveillance video.

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4b. On 10/09/07, the CVCCTF utilized a cooperating witness (hereafter CW1) to purchase gasoline from the suspects. CW1 met Steve Black at A Touch of Class Car Wash located in Lynchburg, VA. CW1 and another vehicle followed Steve Black to the Stop-In Food Store/Shell gas station located at [REDACTED], Madison Heights, VA. Steve Black was unable to get the credit cards approved by using the "pay at the pump" method. CW1 and the other vehicle then followed Steve Black to a Wilco/Hess gas station located at [REDACTED] [REDACTED] Madison Heights, VA. Steve Black again attempted to purchase gas by utilizing the "pay at the pump" method with the credit cards failing to be approved. Steve Black then had CW1 and the other vehicle follow him to the Wal Mart located in Madison Heights, VA. Steve Black then met with [REDACTED] to obtain new credit cards. Once the new credit cards were obtained, CW1 and the other vehicle followed Steve Black to the Sheetz gas station located at [REDACTED] [REDACTED] Madison Heights, VA. Steve Black then purchased gas using the "pay at the pump" method for CW1 and the other vehicle. CW1 obtained \$53 worth of gas and paid Steve Black \$25. The other vehicle obtained \$44.27 in gas and paid Steve Black an unknown sum of money. The credit card utilized in this transaction was Capital One Visa account number [REDACTED] [REDACTED] [REDACTED] [REDACTED]. In order for this transaction to occur, a communication was sent from the local Sheetz store to the Sheetz Distribution Center in Claysburg, PA. At the time of this transaction the account was assigned to Victim 2. Steve Black, [REDACTED] [REDACTED] and [REDACTED] were not authorized to use this account by

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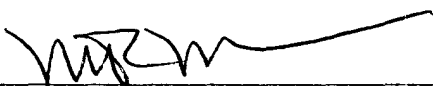
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Victim 2 and Victim 2 did not authorize this purchase. This transaction was monitored by members of the CVCCTF.

4c. On 11/06/07, this affiant and members of the CVCCTF met with another cooperating witness (hereafter CW2) in order to purchase gasoline. CW2 placed a consensually monitored phone call to [REDACTED]. [REDACTED] advised CW2 to meet at the Sheetz gas station located at [REDACTED] Lynchburg, VA. CW2 met [REDACTED] who utilized the "pay at the pump" method for purchasing the gas. [REDACTED] filled CW2's vehicle with \$75 worth of gas and was paid \$40 cash by CW2. The credit card utilized in this transaction was Capital One Visa account number [REDACTED]. In order for this transaction to occur, a communication was sent from the local Sheetz store to the Sheetz Distribution Center in Claysburg, PA. At the time of this transaction the account was assigned to Victim 3. Steve Black, [REDACTED], and [REDACTED] were not authorized to use this account by Victim 3 and Victim 3 did not authorize this purchase. This transaction was monitored by this affiant and members of the CVCCTF.

  
B. Douglas McIntosh  
Special Agent  
US Secret Service

Subscribed and sworn  
before me this 14<sup>th</sup> of January , 2008

  
Michael F. Urbanski  
United States Magistrate Judge